

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

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| IN RE: Joel Contreras |) | Chapter 13 |
| |) | Case No. 22 B 12912 |
| Debtor(s) |) | Judge Deborah L. Thorne |

Notice of Motion and Certificate of Service

Joel Contreras
3137 S. 54th Ct.
Cicero, IL 60804

Debtor Attorney: David Freydin Ltd
via Clerk's ECF noticing procedures

On March 29, 2023 at 10:30 am, I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, either in Dirksen Federal Building, 219 S. Dearborn St, Courtroom 682, Chicago, IL 60604 or electronically as described below, and present this motion, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 160 9362 1728 and the password is none. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

I certify under penalty of perjury that this office caused a copy of this notice and the attached motion to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Tuesday, March 21, 2023.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

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Motion to Dismiss Case For Unreasonable Delay

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 11/06/2022.
2. The debtor(s) have failed to provide an Affidavit of Compliance.
3. The debtor(s) have failed to provide copies of all payment advices or other evidence of payment received within 60 days before the date of filing the petition.
4. The debtor(s) have failed to maintain payments to the Trustee's office as required under 11 U.S.C. §1326.
5. The debtor(s) have failed to attend three scheduled §341(a) meetings of the creditors.
6. The debtor(s) have failed to resolve the pending objection(s) to the plan.
7. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

/s/ MARILYN O. MARSHALL
MARILYN O. MARSHALL, TRUSTEE

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